

EXHIBIT I

**Plaintiff Gordon's Answers and Responses
to Defendant Adknowledge's First
Interrogatories and Requests for Production
of Documents to Gordon, pp. 1, 4**

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE
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7 JAMES S. GORDON, Jr., a married
8 individual, d/b/a
9 'GORDONWORKS.COM'; OMNI
INNOVATIONS, LLC, a Washington
10 limited liability company;

11 Plaintiffs,
12 v.
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14 VIRTUMUNDO, INC., a Delaware
corporation d/b/a
ADKNOWLEDGEEMAIL.COM;
15 ADKNOWLEDGE, INC., a Delaware
corporation, d/b/a
ADKNOWLEDGEEMAIL.COM;
SCOTT LYNN and individual and his
16 marital community; and JOHN DOES
I-X,
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19 Defendants.

20 NO. CV06-0204JCC
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22 **PLAINTIFF OMNI'S ANSWERS
AND RESPONSES TO DEFENDANT
VIRTUMUNDO'S FIRST
INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO OMNI**

23 Plaintiff Gordon answers Defendant Virtumundo's First Interrogatories and Requests For
24 Production of Documents as follows:
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26 **GENERAL OBJECTIONS**

- 27 1. Plaintiff objects to each interrogatory to the extent that it seeks material or
information that is privileged as an attorney-client communication. This objection
hereinafter will be referred to as the "**Attorney-Client Privilege Objection.**"
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2. Plaintiff objects to each interrogatory to the extent that it seeks material or
information prepared by or developed at the direction of counsel insofar as it is
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16. Steps included unsubscribing via emails, sending complaints to emails in Whois databases, sending complaints to network service providers, sending complaints to government agencies/offices, setting up an auto-responder to send reply to spammer to cease and desist (plus contract to receive email), send certified and certified return receipt letter to spammers.
 17. Unwanted and offending emails use up bandwidth on Omni's server; interfere with Omni's interactive service business; clog associated computers; require wasted time to deal with; are unlawful; and violate Omni's right to privacy, and right to be free from intrusive solicitations.
 18. Plaintiff asserts the Relevancy and Ambiguity objections. Further, this question calls for a legal conclusion, which Plaintiff is not competent to make.

Robert J. Siegel, WSBA #17312

19. July 22, 1999 registered gordonworks@gordonworks.com. I do not know the IP address. I do not know which email addresses may have been registered by Omni's clients.
 20. The offending emails as to Omni were sent to email addresses and domains hosted on Omni's server, and received by Omni's server, and computers owned by those whose email addresses and domains are hosted by Omni.
 21. Omni did not register 'GORDONWORKS.COM'.
 22. May 2005 and on-going...Bonnie, Jamila, Jay, Jonathan, and Emily Abbey. Griffin Online Domain, and Anthony Potts. There are other clients who do not want to be identified in lawsuits with spammers, as they are concerned that they will become targets of unlawful spam, and harassed by spammers. These accounts were free for the first year, subject to data collection by me for research purposes. The local market value of the account is about \$35.00 per month depending on capacity, services, etc. Addresses will be provided subject to a protective order.
 23. See response to No. 13.
 24. Omni has preserved the offending emails on discs (copy of which has been provided to defendants); Omni has preserved the original emails in an email program Eudora on cds. Omni routinely "deep" cleans (and occasionally replaces its hard drive, runs virus checks, removes malware, defragments, and other maintenance due to continued attacks by spammers. Many thousands of emails and files are routinely weekly scrubbed from Omni's server.
 25. The emails, which have defendant's name in the email or a domain it owns or controls, comprise the bulk of the emails in this complaint.